

May 2, 1994

Mr. Reed Hundt, Chairman
Federal Communication Commission
1919 M Street N.W.
Washington, D.C. 20554

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Dear Mr. Hundt,

According to recent articles, the FCC is presently reviewing its Equal Employment Opportunity policies.

I would like to voice my opinion on such.

Obviously, with the present policies, minorities are not fairly considered for promotions into management, decision-making positions, educated by experience, nor given opportunities for ownership of television stations.

However, as it is clearly seen in broadcasting sports, comedy, music and, other forms of television entertainment provided by minorities (Black-Americans in particular), networks, stations, cable operators and advertising agencies don't hesitate in utilizing minority programming for profit.

To pinpoint another example, the FOX Network and it's affiliates target Black-American viewership for profit and ratings. This network was built on Black viewership and programming! Yet, I have not seen any representation of Black-American business personnel involved in decision-making management positions in any of the trade magazines. If there are any, please enlighten me.

This tactic has obviously been used in the past with other networks and worked successfully. But, the only Black representation normally comes by way of producing programming by the actors themselves. There is no representation on the front-line of business.

Many station owners, network, cable and other highly paid management personnel will cry that there is no available qualified talent to promote or hire. Surely this excuse has been used to often! The fact of the matter is, that while other industries have succeeded in promoting, hiring and utilizing Black-American business and development, I am ashamed to state that the broadcast business that I love so dearly is four centuries behind the real business world in its Equal Employment Opportunity Program!

There are plenty of college graduates and Black-Americans with experience in the field of broadcasting, television in particular. And, while as an industry we may boast about success stories of

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White-American females who may have no qualifications and education, we have yet to utilize and educate hard working Black-Americans who strive to make this business stronger, better and more competitive. The decision-makers from the "good old boy" club use the white female to skip their opportunity to help a real minority. We must understand that these are two separate roles.

Mr. Hundt, if I may be so bold as to say the broadcasters of the 1990's have a lot to learn! And, until we can take a stand on this issue and enhance our EEO guidelines with fair standards for all, we as an industry will suffer!

Just as unions of the old days were broken from holding down industries and individual companies, it is now time to break-up the "good old boy" networks in broadcasting.

Following are several suggestions on how we as an industry could attack this problem:

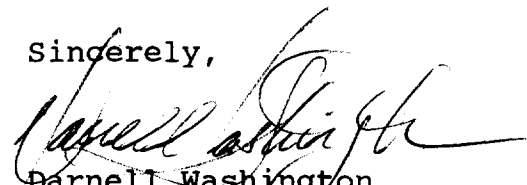
- 1) Require all broadcast/cable networks to have a in-house minority recruitment program. With a actual recruitment director in a senior management position. Surely if you qualify to be a "network", this position should be a requirement with efforts reported to the FCC on a bi-annual basis.
- 2) Require all radio and television group owners with more than four stations to employ a recruitment director that would also report bi-annually to the FCC. Insure the success of these directors by having them actively looking for qualified minorities in colleges and other recruitment agencies. With all the recent station purchasing, trading, lease management agreements and huge group alliances being formed, one additional position will not make or break the revenue stream of these group owners.
- 3) Require all broadcast networks, group owners (4+), cable networks and, MSO's to implement a 6 month minority training program in sales, programming, news or administrative operations management. A minimum of two graduates annually would insure education and opportunities of minorities.
- 4) The FCC should conduct annual ownership seminars and make distressed properties available to qualified minorities graduating on an annual basis. This type of program would not only insure education but also build alliances with minorities and group owners who are willing to extend themselves through the aforementioned programs of recruitment.

While these are certainly ideas "off the cuff" right now, with sound thought and good judgement from the FCC these type of programs could easily become a wake-up call for meeting EEO obligations.

Improving the EEO regulations can be done, if the FCC will take a stand and implement new enforcement principles. As a 12 year veteran of the broadcast industry, I am compelled to offer my services and assistance.

Thank-you for your time and consideration.

Sincerely,



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